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*Counsel for Individual and Representative
 Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

J. DOE 1, et al.,
 Individual and Representative Plaintiffs,
 v.
 GITHUB, INC., et al.,
 Defendants.

Case Nos. 4:22-cv-06823-JST
 4:22-cv-07074-JST

**JOINT STIPULATION AND [PROPOSED]
 ORDER REGARDING MOTION FOR
 PROTECTIVE ORDER DEADLINES**

Pursuant to Civil Local Rule 6-2(a), Plaintiffs J. Doe 1-4 (“Plaintiffs”) and Defendants GitHub, Inc; Microsoft Corporation; OpenAI, Inc.; OpenAI, L.P.; OpenAI GP, L.L.C.; OpenAI Startup Fund GP I, L.L.C.; OpenAI Startup Fund I, L.P.; and OpenAI Startup Fund Management, LLC (“Defendants”) (collectively, the “Parties”), by and through their counsel of record, hereby jointly make the following stipulated request to vacate the current deadlines related to Plaintiffs’ Motion for Entry of Protective Order (ECF No. 49) upon entry of the Stipulated Protective Order

1 filed concurrently herewith, as set forth below:

2 WHEREAS, on January 23, 2023, Plaintiffs filed their Motion for Entry of Protective
3 Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade
4 Secrets (the “Motion”) (ECF No. 49);

5 WHEREAS, pursuant to Civil Local Rule 7-3, Defendants’ deadline to oppose Plaintiffs’
6 Motion was February 6, 2023, and Plaintiffs’ deadline to reply is February 13, 2023;

7 WHEREAS, on February 8, 2023, pursuant to stipulation by the parties, the Court entered
8 an Order Granting Extension of Time (EFC No. 55) that extended Defendants’ deadline to
9 respond to the Motion until February 21, 2023, Plaintiffs’ deadline to reply to February 28, 2023,
10 and set the hearing for April 6, 2023;

11 WHEREAS, the Parties have conferred and agreed to the Proposed Stipulated Protective
12 Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade
13 Secrets filed concurrently herewith (“Proposed Stipulated Protective Order”);

14 WHEREAS, the parties have conferred and agreed that the deadlines related to the
15 Motion should be vacated upon entry of the Proposed Stipulated Protective Order as an order by
16 the Court because it will moot the Motion;

17 WHEREAS, vacating these deadlines related to Plaintiffs’ Motion for Entry of Protective
18 Order will not alter the date of any other event or deadline already fixed by Court order.

19 NOW THEREFORE, the Parties STIPULATE AND AGREE, by and through their
20 counsel, to vacate the deadlines related to Plaintiffs’ Motion for Entry of Protective Order upon
21 entry of the Proposed Stipulated Protective Order as an order by the Court.

22 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

23
24 Dated:

25 _____
26 Honorable Jon S. Tigar
27 United States District Judge
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1 Dated: February 21, 2023

By: Joseph R. Saveri
Joseph R. Saveri

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18 *Counsel for Plaintiffs and the Proposed Class*
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1 Dated: February 21, 2023

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11 *Counsel for GitHub, Inc. and Microsoft Corporation*

12 Dated: February 21, 2023

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22 *Startup Fund I, L.P.; and OpenAI Startup Fund*
23 *Management, LLC*

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(h)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from any other signatory to this document.

Dated: February 21, 2023

By: /s/ Joseph R. Saveri
Joseph R. Saveri